

EXHIBIT D

Exhibit A



Logout

Picard v. Helene Saren-Lawrence Subpoena to Valley National Bank

From: BKamski@valleynationalbank.com

To: kcullen@windelsmarx.com

Cc: hchaitman@chaitmanllp.com, MPetrucci@valleynationalbank.com, LRooney@valleynationalbank.com

Sent: 1/25/2016 3:09:28 PM

Attachments: 201601251244.pdf

Karen -

I have had Valley's Research area retrieve whatever records were still in the Bank's possession relevant to the time period set forth in your subpoena in the above captioned matter which was served upon Valley on January 7, 2016.

The Bank was able only to retrieve monthly statements for the period January 2007 through June 2007 but was able to retrieve statements, deposited items and checks for the period July 2007 through December 2008. I have reviewed all of these documents. Valley does not maintain any records for this account prior to January 2007.

Also, I am aware you received an email dated January 20, 2016 from Helen Chaitman, who represents Ms. Saren-Lawrence, contesting and objecting to the scope of the subpoena. So all parties are aware of its contents, I am copying Ms. Chaitman with a copy of this email.

Despite the return date of the subpoena, I have spoken with Ms. Chaitman and she has given Valley permission to forward to attached documentation to you. Attached are copies of five checks which were drawn on the account of Bernard L. Madoff and deposited between August 2007 and August 2008 into Ms. Saren-Lawrence's account (an account she maintains jointly with her husband, James Lawrence). These checks total \$221,000. The account's 6/29/07 statement reflects a \$40,000 deposit on 6/6/07 but, as I previously indicated, the underlying items no longer exist in the Bank's files and cannot be retrieved. Therefore I cannot opine whether this deposit consisted of a check from Mr. Madoff. I also attach a copy of a page of the account statement dated 11/30/07 showing a wire transfer from Ms. Saren-Lawrence's account in the amount of \$68,291 with "Bernard L. Madof" (sic) shown as the beneficiary.

Please let me know the outcome of the hearing to be held Wednesday, January 27th and whether Valley will be required to produce any or all of the retrieved documents in their entirety.

Logout

Bill

William J. Kamski
First Vice President
Senior Attorney
Valley National Bank
1455 Valley Road
Wayne, NJ 07470
Phone (973) 305-4054
Fax (973) 305-1605
EMail bkamski@valleynationalbank.com

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DEPOSIT TICKET

HELENE S. LAWRENCE
JAMES G. LAWRENCE

DATE 8/20/07 08/20/07 08/21/2007 2 0001827202 018

DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

Valley National Bank
454 Broadway, New York, N.Y. 10013

\$ 40,000.00

026006740 01 827202 05 00004000000

1015 18189

2212-013804

VALLEY NATL BANK

POD

08/21/2007 018

MADISON

Date 08-21-2007 Serial 0 TC 5 TR 26006790 Sequence 318096290
Account 1827202 Amount 40000.00 Branch 0 TellerNumber 0

BERNARD L. MADOFF

8/16/07

188214

HELENE S. LAWRENCE

08/21/2007 29 0001827202 018

*****FORTY THOUSAND 00/100 DOLLARS

BERNARD L. MADOFF

POD

08/21/2007 018

1015 18190

2212-013804

VALLEY NATL BANK

POD

08/21/2007 018

MADISON

1827202

HELENE S. LAWRENCE
(Deposit Only)

Date 08-21-2007 Serial 188214 TC 0 TR 31100267
Sequence 318096300 Account 6301428151509 Amount 40000.00
Branch 0 TellerNumber 0

COPY

JAMES G LAWRENCE OR
HELENE S LAWRENCE
300 E 59TH ST APT 3006
NEW YORK NY 10022-2057

0

Page: 1

Chks Paid:

EMP Statement Date: 11/30/07

Account Number: 1827202

Street:

City; State, Zip:

Signature:

Indicate to the right any changes of address. Cut at the dotted line and return this form to: Valley Customer Service, 1445 Valley Road, Wayne, NJ 07470 -

***** NOW Account 1827202 *****

Non-Check Transactions:

Date	Description	Amount
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11/20 FISERV ISS ACH ENTRY
11/21 IMAD:20071121B1B7SM1F000310
BENEFICIARY NAME:BERNARD L MADOF
REC BANK:JPMCHASE.
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11/21	Wire Transaction Fee	25.00-
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DEPOSIT TICKET

HELENE S. LAWRENCE
JAMES G. LAWRENCE

DATE 01/14/2008

VALLEY NATIONAL BANK

\$ 41000.00

1026006790 01 827202 05 0004100000

Date 01-14-2008 Serial 0 TC 5 TR 26006790 Sequence 50330300
Account 1827202 Amount 41000.00 Branch 0 TellerNumber 0

VALLEY NATL BANK

0050330310 01/14/2008 025

1827202

0004100000

BERNARD L. MADOFF

193270

1/11/08

HELENE SAREN-LAWRENCE

40000.00 DOLLARS

BERNARD L. MADOFF

1-2A620-3

00173270 0031100267 6301428151 0004100000

Date 01-14-2008 Serial 193270 TC 0 TR 31100267
Sequence 50330310 Account 630142815109 Amount 41000.00
Branch 0 TellerNumber 0

Date 04-21-2008 Serial 196072 TC 0 TR 31100267
Sequence 343476650 Account 6301428151509 Amount 40000.00
Branch 0 TellerNumber 0

Know Your Employees - Reduce Inmate Activity
 04-10-11 1827202
 DEPARTMENT BANK PROSECUTOR
 VALLEY NATL BANK POD
 0543476650 04/21/2008 035

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VALLEY NATL BANK - POD
0212-0130-3
0000457200-05/16/2008-025

EXHIBIT A

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Q01201700A
Q01201700B
Q01201700C
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Q01201700Q
Q01201700R
Q01201700S
Q01201700T
Q01201700U
Q01201700V
Q01201700W
Q01201700X
Q01201700Y
Q01201700Z

Date 08-29-2008 Serial 0 TC 5 TR 26006790 Sequence 436561240
Account 1827202 Amount 50000.00 Branch 0 TellerNumber 0

[illegible]

Date 08-29-2008 Serial 199254 TC 0 TR 31100267
Sequence 436561250 Account 6301428151509 Amount 50000.00
Branch 0 TellerNumber 0